



*Consulting Engineers  
and Scientists*

PASTOR, BEHLING & WHEELER, LLC  
2201 Double Creek Drive, Suite 4004  
Round Rock, TX 78664

Tel (512) 671-3434  
Fax (512) 671-3446

June 2, 2006  
(PBW Project No. 1352)

VIA ELECTRONIC MAIL AND  
OVERNIGHT DELIVERY

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Ms. Barbara A. Nann, Assistant Regional Counsel  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6RC-S)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: Advance Notice of RI/FS Field Activities, Gulfco Marine Maintenance Site, Freeport,  
Texas

Dear Mr. Miller and Ms. Nann:

Pursuant to Section XII, Paragraph 55 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW), on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto), herewith provides advance notice of upcoming RI/FS field activities. As discussed in our previous telephone conversations, multiple RI/FS field activities will be initiated during the next few months. Based on our current schedule, the first of these activities will be the collection of surface water and sediment samples from the Intracoastal Waterway, which we anticipate starting on June 19, 2006. This work will be performed by Benchmark Ecological Services, Inc. (BESI) as a subcontractor to PBW. In accordance with Paragraph 84 of the UAO, please find attached current insurance certificates for BESI and PBW.

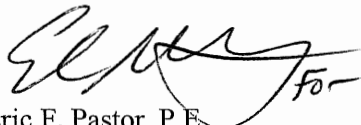
In accordance with Paragraph 52 of the UAO, I certify that I have been fully authorized by the Respondents to submit this information and to legally bind all Respondents thereto.

Mr. Miller and Ms. Nann  
June 2, 2006  
Page 2 of 2

Thank you for your continued support on this project. Should you have any questions or comments regarding these planned activities, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'E. Pastor', with a stylized flourish at the end.

Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Brent Murray - Sequa Corporation  
Mr. Rob Rouse - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morris III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP

# ACORD™ CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)  
4/10/2006PRODUCER Phone: 212-488-0380 Fax: 212-488-0421  
renkel & Co., Inc.  
1740 Broadway, 5th Floor  
New York NY 10019THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION  
ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE  
HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR  
ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.INSURED  
Pastor, Behling & Wheeler, LLC  
2000 S. Mays, Suite 300  
Round Rock TX 78664

## INSURERS AFFORDING COVERAGE

NAIC #

INSURER A: Hudson Specialty Ins. Co.

37079

INSURER B: Hartford Casualty Insurance C 1

INSURER C:

INSURER D:

INSURER E:

## COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED.  
NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS  
CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL  
THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR ADD'L LTR INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> Contr. Poll. Liab GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO- JECT <input type="checkbox"/> LOC	FEC6106275	3/18/2006	3/18/2007	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 50,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000
B	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS	AF6460	3/18/2006	3/18/2007	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
	GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN EA ACC AUTO ONLY: AGG \$
A	EXCESS/UMBRELLA LIABILITY <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> DEDUCTIBLE <input checked="" type="checkbox"/> RETENTION \$ 10,000	FXS6106276	3/18/2006	3/18/2007	EACH OCCURRENCE \$ 5,000,000 AGGREGATE \$ 5,000,000 \$ \$ \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below	65WECPH8063	3/18/2006	3/18/2007	<input checked="" type="checkbox"/> WC STATU- TORY LIMITS <input type="checkbox"/> OTH- ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
A	OTHER Professional Liability	FEC6106275	3/18/2006	3/18/2007	Each Occur/Claim \$1,000,000 Aggregate \$2,000,000

## DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

Sequa Corporation, the United States Environmental Protection Agency, and client and its employees, officers,  
directors, agents, partners, successors, and assigns are added as additional insureds. Insurance is primary and  
non-contributory.Re: 906 Marlin Ave Freeport, TX  
\*30 day NOC

## CERTIFICATE HOLDER

Sequa Corporation  
Attn: Brent Murray  
1425 US Hwy One, Suite 2150  
Juno Beach FL 22408

## CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED  
BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER  
WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE  
CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO  
SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON  
THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

*James R. Schaefer Signature*

**ACORD<sup>TM</sup> CERTIFICATE OF LIABILITY INSURANCE**DATE (MM/DD/YYYY)  
4/10/2006PRODUCER Phone: 212-488-0380 Fax: 212-488-0421  
renkel & Co., Inc.  
1740 Broadway, 5th Floor  
New York NY 10019THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION  
ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE  
HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR  
ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.INSURED  
Pastor, Behling & Wheeler, LLC  
2000 S. Mays, Suite 300  
Round Rock TX 78664

## INSURERS AFFORDING COVERAGE

NAIC #

INSURER A: Hudson Specialty Ins. Co. 37079

INSURER B: Hartford Casualty Insurance C 1

INSURER C:

INSURER D:

INSURER E:

## COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED.  
NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS  
CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL  
THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR ADD'L LTR INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	<b>GENERAL LIABILITY</b> <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> Contr. Poll. Liab  GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO- JECT <input type="checkbox"/> LOC	FEC6106275	3/18/2006	3/18/2007	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 50,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000
B	<b>AUTOMOBILE LIABILITY</b> <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS	AF6460	3/18/2006	3/18/2007	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000  BODILY INJURY (Per person) \$  BODILY INJURY (Per accident) \$  PROPERTY DAMAGE (Per accident) \$
	<b>GARAGE LIABILITY</b> <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$  OTHER THAN AUTO ONLY: EA ACC \$ AGG \$
A	<b>EXCESS/UMBRELLA LIABILITY</b> <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE  <input type="checkbox"/> DEDUCTIBLE <input checked="" type="checkbox"/> RETENTION \$ 10,000	FXS6106276	3/18/2006	3/18/2007	EACH OCCURRENCE \$ 5,000,000 AGGREGATE \$ 5,000,000  \$  \$  \$
B	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below	65WECPH8063	3/18/2006	3/18/2007	<input checked="" type="checkbox"/> WC STATU- TORY LIMITS <input type="checkbox"/> OTH- ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
A	<b>OTHER</b> Professional Liability	FEC6106275	3/18/2006	3/18/2007	Each Occur/Claim \$1,000,000 Aggregate \$2,000,000

## DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

The Dow Chemical Co., the United States Environmental Protection Agency, and client and its employees, officers,  
directors, agents, partners, successors, and assigns are added as additional insureds. Insurance is primary and  
non-contributory.Re: 906 Marlin Ave Freeport, TX  
\*30 day NOC

## CERTIFICATE HOLDER

The Dow Chemical Co.  
Attn: Rob Rouse  
2030 Dow Center  
Midland MI 48674

## CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED  
BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER  
WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE  
CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO  
SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON  
THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

*James Antkowiak Signature*

PRODUCER		THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.	
Monroe & Monroe Insurance Agen 2921 Galleria Dr., Suite 102 Arlington TX 76011 Phone: 817-640-5035 Fax: 817-640-0131		INSURERS AFFORDING COVERAGE	
INSURED		NAIC #	
Benchmark Ecological Svc., Inc Bob Davidson P.O. Box 158 Katy TX 77492-0158		INSURER A: Hudson Specialty Ins Company INSURER B: The Hartford- INSURER C: Texas Mutual Insurance Co. INSURER D: INSURER E:	
		00914	

## COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR ADD'L LTR	INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
A		GENERAL LIABILITY	FEC6106345	03/24/06	03/24/07	EACH OCCURRENCE	\$ 1000000
		<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY				DAMAGE TO RENTED PREMISES (Ea occurrence)	\$ 50000
		<input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR				MED EXP (Any one person)	\$ 5000
		<input checked="" type="checkbox"/> Pollution Liab				PERSONAL & ADV INJURY	\$ 1000000
						GENERAL AGGREGATE	\$ 2000000
						PRODUCTS - COMP/OP AGG	\$ 2000000
GEN'L AGGREGATE LIMIT APPLIES PER:							
<input checked="" type="checkbox"/> POLICY	<input type="checkbox"/> PRO-JECT	<input type="checkbox"/> LOC					
B A A		AUTOMOBILE LIABILITY	46UECZQ5300 FEC6106345 FEC6106345	10/26/05 03/24/06 03/24/06	10/26/06 03/24/07 03/24/07	COMBINED SINGLE LIMIT (Ea accident)	\$ 1000000
		<input type="checkbox"/> ANY AUTO				BODILY INJURY (Per person)	\$
		<input checked="" type="checkbox"/> SCHEDULED AUTOS				BODILY INJURY (Per accident)	\$
		<input checked="" type="checkbox"/> HIRED AUTOS				PROPERTY DAMAGE (Per accident)	\$
<input checked="" type="checkbox"/> NON-OWNED AUTOS							
		GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT	\$
		<input type="checkbox"/> ANY AUTO				OTHER THAN EA ACC AGG	\$
A		EXCESS/UMBRELLA LIABILITY	FXS6106346	03/24/06	03/24/07	EACH OCCURRENCE	\$ 5000000
		<input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE				AGGREGATE	\$ 5000000
		<input type="checkbox"/> DEDUCTIBLE					\$
		<input checked="" type="checkbox"/> RETENTION \$10000					\$
C		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY	SBP00720001	07/19/05	07/19/06	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER	
		ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED?				E.L. EACH ACCIDENT	\$ 1000000
		If yes, describe under SPECIAL PROVISIONS below				E.L. DISEASE - EA EMPLOYEE	\$ 1000000
						E.L. DISEASE - POLICY LIMIT	\$ 1000000
A		OTHER					
A		Prof Claims Made	FEC6106345	03/24/06	03/24/07	Profes.	INCL. IN GL

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

\*\*See Notes\*\*

## CERTIFICATE HOLDER

## CANCELLATION

USEPA11  Pastor, Behling & Wheeler, LLC Eric Pastor 2201 Double Creek Dr. Ste 4004 Round Rock TX 78664	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.  AUTHORIZED REPRESENTATIVE <i>Mile Monroe</i>
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## **IMPORTANT**

If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

## **DISCLAIMER**

The Certificate of Insurance on the reverse side of this form does not constitute a contract between the issuing insurer(s), authorized representative or producer, and the certificate holder, nor does it affirmatively or negatively amend, extend or alter the coverage afforded by the policies listed thereon.

**NOTEPAD:**

HOLDER CODE

USEPA11

BENCH-2

PAGE 3

INSURED'S NAME

Benchmark Ecological Svc., Inc

OP ID AD

DATE 06/02/06

The United States Environmental Protection Agency, The Client & its employees, officers, directors, agents, partners, successors, and assigns; and Consultant & its employees, officers, directors, agents, partners, successors, and assigns. Client and Consultant shall not be subject to the "other insurance" condition or other policy terms which conflict with this Agreement, it being the intent that the insurance policies of Consultant and its agents, affiliates, or subcontractors (except the policy in subparagraph shall be primary insurance and not contributory with any other insurance that Client may have in effect. All insurance policies shall provide, as evidenced by Certificates of Insurance, that the insurance coverage provided shall not be canceled, reduced, restricted or changed in any way without at least thirty (30) days prior written notice to the Consultant In the event of any such cancellation, non-renewal, reduction, restriction or change in any insurance, the Contractor shall immediately replace such insurance.

Consultant: Pastor, Behling & Wheeler, LLC

Client: Chromalloy American Corporation and The Dow Chemical Company